

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC  <b>STIPULATION OF DISMISSAL WITHOUT PREJUDICE</b>
This document relates to the cases listed on the Exhibit attached hereto.	

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

s/ Eric M Terry  
Eric M Terry  
eric@thlawyer.com  
TORHOERMAN LAW LLC  
210 S Main St.  
Edwardsville, IL 62025  
P: 618.656.4400  
F: 618.656.4401

**ATTORNEY FOR PLAINTIFFS**

s/ Richard B. North, Jr.  
Richard B. North, Jr.  
richard.north@nelsonmullins.com  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
201 17<sup>th</sup> St. NW, Ste. 1700  
Atlanta, GA 30363  
P: 404.322.6000  
F: 404.332.6397

**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Eric M Terry  
Eric M Terry

## EXHIBIT "A"

<b>Member Case Number</b>	<b>Full Name of Plaintiff</b>	<b>Date Answer Filed (If applicable)</b>
2:19-cv-02815-DGC	Paulina Bonds	5/16/2019
2:16-cv-02549-PHX-DGC	Patsy Cecchine	8/10/2016
2:19-cv-01137-PHX-DGC	Agatha Fields	3/19/2019
2:19-cv-02816-DGC	Everett Griffith	5/16/2019
2:16-cv-00274-PHX-DGC	George Hahn	2/10/2016
2:16-cv-00129-PHX-DGC	Tammy Hesser-Schluter	6/30/2016
2:16-cv-00275-PHX-DGC	Paul Kerbel	2/15/2016
2:16-cv-00282-PHX-DGC	David Light	2/17/2016
2:16-cv-00276-PHX-DGC	Concepcion Lopez	2/17/2016
2:17-cv-00730-PHX-DGC	Violet Mondragon	3/22/2017
2:16-cv-00322-PHX-DGC	Randy Nelson	2/17/2016
2:19-cv-01545-PHX-DGC	Glenn Ogg	3/25/2019
2:16-cv-00277-PHX-DGC	David Ruck	2/17/2016
2:16-cv-00955-PHX-DGC	Tara Schneider	4/15/2016
2:17-cv-01206-DGC	Joseph Schutz	4/28/2017
2:16-cv-02075-PHX-DGC	William Terry	7/5/2016
2:17-cv-00700-PHX-DGC	Diana Trevino	3/22/2017